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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MARYLAND
3 (Northern Division)
4

5 MELVIN NEWSOME, et al, :
6 Plaintiffs :
7 vs. : CIVIL ACTION NO.
8 UP-TO-DATE LAUNDRY, INC., :
9 et al : SO1-2257
10 Defendants :
11 -----
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13 Deposition of THOMAS J. HENDRICKSON,
14 corporate designee of Up-To-Date Laundry, Inc.,
15 taken on Monday, March 17, 2003, at 11:40 a.m.,
16 at the Law Offices of Whiteford, Taylor &
17 Preston, Seven St. Paul Street, Baltimore,
18 Maryland, before CARLA M. SINCLAIR, Notary
19 Public.
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21

Reported by: CARLA M. SINCLAIR, RPR, CRR

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1 he said it.

2 A. More or less out of frustration. The
3 niggers, that's where the turnover is coming
4 from. Like that. Something like that. I don't
5 remember word for word.

6 Q. Do you think the word nigger is an
7 offensive word?

8 A. If used improperly toward people,
9 absolutely.

10 Q. Do you use the word?

11 A. No, ma'am.

12 Q. When you say if used improperly, what
13 did you mean by that?

14 A. If you direct it to someone's face, then
15 I believe it becomes a problem.

16 Q. Why is that?

17 A. Because you are insulting them. It's a
18 racial slur.

19 Q. So you never have used the word nigger?

20 A. I never said I never used the word. I
21 never insulted people. I don't use it now since

1 Q. From your experience and from what you
2 know of these postings, are Hispanics more
3 productive workers than black workers?

4 A. No.

5 Q. Do you believe as an opinion that
6 Hispanics are better workers than blacks?

7 A. No, ma'am. I do not.

8 Q. Did any employees ever come to you and
9 complain about these comparisons being made
10 between Hispanics and blacks?

11 A. No.

12 Q. Did employees ever come to you to
13 complain about the use of racial epithets?

14 A. No.

15 Q. Have you ever seen or heard Nancy Stair
16 using racial epithets?

17 A. Nigger.

18 Q. What context?

19 A. Behind doors again. Pretty much the
20 same thing Brad said.

21 Q. How many times have you heard her say

1 that?

2 A. You know, to ask me, probably two, two
3 or three. It's the same thing.

4 Q. When you say behind closed doors, with
5 only you present?

6 A. Yes. It's not like they are doing it
7 out there shouting at the people.

8 Q. In what context were her remarks made?

9 A. Same thing. Frustration at turnover.
10 We are having problems because of niggers or
11 whatever.

12 Q. What kind of problems was she referring
13 to?

14 A. I would say the turnover, not having
15 good production, whatever.

16 Q. Did any employees ever complain to you
17 about her using that word?

18 A. No.

19 Q. Other than Brad and Nancy, have you
20 heard any other supervisors or managers use that
21 word?